

Exhibit 53

Plaintiffs' Corrected Averment of Jurisdictional Facts and
Evidence and/or Statement of Facts as to Defendant Al Rajhi Bank
Pursuant to Rule 56.1

~~SECRET~~(U) AL-HARAMAIN ISLAMIC FOUNDATION, SOMALIA

DATE: 2/11/02

(U) Statement of the Case:

(S) [REDACTED] Based upon information available to the United States Government, there is a reasonable basis to believe that Al-Haramain Islamic Foundation, Somalia is assisting in, sponsoring, or providing financial, material, or technological support for, or financial or other services to or in support of, or is otherwise associated with, terrorists and terrorist-related organizations listed in the Annex to Executive Order 13224.

(S) [REDACTED] the following unclassified information clearly establishes Al-Haramain Somalia's links to terrorist activity. We believe that this information is generally reliable and, taken as a whole, supports the decision to block the assets of Al-Haramain Somalia (and its directors).

(S) [REDACTED] The Saudi Arabia-based Al-Haramayn Islamic Foundation is a private, charitable, and educational organization tasked with conveying the true Islamic teachings throughout the world. It derives its name from the Arabic word Al-Haramain that means the Two Holy Mosques in Makkah and Madinah. The Al-Haramain Islamic Foundation's total expenditures for 2000 exceeded USD 56 million. The Government of Saudi Arabia provided more than one-half of this money via direct contributions and grants through various religious foundations. A growing amount of money now, however, comes from grants from other countries, individual Muslim benefactors, and special campaigns, which target entities around the world. [Source: ⁱ]

(S) Al-Haramain Somalia's Ties to Terrorists:

(S) [REDACTED] The U.S. has assembled evidence that shows a history of ties between Al-Haramain Somalia and Usama bin Laden's al-Qaida network, Al-Itihaad al-Islamiya (AIAI), and other associated entities and individuals. For example, over the past few years, Al-Haramain Somalia has provided a means of funneling money to AIAI by disguising funds as intended to be used for orphanage projects or the construction of Islamic schools and mosques [Source: ⁱⁱ].

Derived By: [REDACTED]

Derived From: [REDACTED]

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~~SECRET~~ [REDACTED]

Declassify on: [REDACTED]

(S) [REDACTED] The organization has also employed and provided salaries to AIAI members [Source: ⁱⁱⁱ, ^{iv}], [REDACTED]

[Sources: ^v, ^{vi}].

(S) [REDACTED] The evidence indicates that even after AIAI was named in the Annex to E.O. 13224 and subsequently designated by the United Nations under UNSCR 1333, Al-Haramain Somalia has continued to provide financial support [Source: ^{vii}] and cover for AIAI operatives, and conceal their activities [Source: ^{viii}].

[Source: ^{ix}].

(S) [REDACTED] Accordingly, the Secretary of the Treasury has the authority to designate Al-Haramain Somalia as subject to Executive Order 13224 pursuant to paragraphs (d)(i) and (d)(ii) based on a determination that it assists in, sponsors, or provides financial, material, or technological support for, or financial or other services to or in support of, or is otherwise associated with, those persons listed on the Annex to EO 13224.

AL-HARAMAIN, SOMALIA
CASE SUMMARY

(U) Identifying Information

(U) Al-Haramain (variants Al-Haramayn, Al-Haramein) Islamic Foundation, Somalia

(U) AKA - Al-Haramain (variants Al-Haramayn, Al-Haramein), Somalia

(U) AKA - Alharamain (variants Alharamain, Alharamein) Foundation, Somalia

(U) Background

(S) [REDACTED] Al-Haramain is a Saudi Arabia-based, nonprofit, private organization accredited by the United Nations High Commission for Refugees and financed by individual Saudi Salafi

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shaykhs. The NGO is headed by Saudi national and Salafi leader 'Abd Al-Rahman Bin 'Aqil and by the Saudi Higher Commission for Charities. Saudi Arabia's Secretary of State for Islamic Affairs, Shaykh Salah Bin 'Abd-Al-'Aziz, is entrusted with supervising Al-Haramain, however, its charitable activities are supervised by the International Islamic Relief Organization (IIRO). Al-Haramain's branches worldwide officially provide aid to refugees including; apartments, houses and other lodging, refugee camps, medical assistance, food and clothing, [REDACTED] Source: x]

(S) [REDACTED] As of early 2000, Al-Haramain's most extensive national network in Africa was in Somalia. Prior to the August 1998 bombing of the U.S. embassy in Nairobi, Al-Haramain's largest presence had been in Kenya, where they had a half dozen branch offices. Following the bombing and closing of Al-Haramain offices in Kenya, resources were shifted to Somalia. [REDACTED]

[Source: x1]

Derived By: [REDACTED]

Derived From: [REDACTED]

(U) Suspect Activities

(S) [REDACTED] shows a history of ties between Al-Haramain Somalia and Al-Itihaad al-Islamiya (AIAI), Al-Barakat, and Usama bin Laden, persons designated in the Annex or pursuant to E.O. 13224 (September 23, 2001). For example:

- [REDACTED]
- [REDACTED]

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~~SECRET~~ [REDACTED]

[REDACTED]

[REDACTED]

- As of late September 2000, Al Haramain was one of the four most active NGO's in Somalia, and its activities included sending relief food to members of AIAI in AIAI military training camps and offices in Al Waq and Qoryoly, Somalia, [REDACTED] [Source: ^{xix}];

[REDACTED]

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~~SECRET~~ [REDACTED]

[REDACTED]

[REDACTED]

to [REDACTED] that Al-Haramain Somalia continues to maintain close ties with Al-Itihaad al-Islamiya (AIAI), an entity named in the Annex to EO 13224 on September 24, 2001. For example:

[REDACTED]

- In January 2002, Al-Haramain Somalia provided AIAI foreign trainers with food and medicine prior to the commencement of the re-location in Somalia, [REDACTED]
[Source: ^{xxiii}];

- Al-Haramain Somalia continues to maintain a working relationship with AIAI, [REDACTED]
[Source: ^{xxiv}];

[REDACTED]

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- Al-Haramain provides cover for AIAI operatives and conceals their activities, [REDACTED]
[Source: ^{xxvi}];

- [REDACTED]

- [REDACTED]

- Additionally, Al Haramain in Mogadishu is connected to Al-Qaida (NFI), [REDACTED]
[Source: 18].

(U) Strength of Information

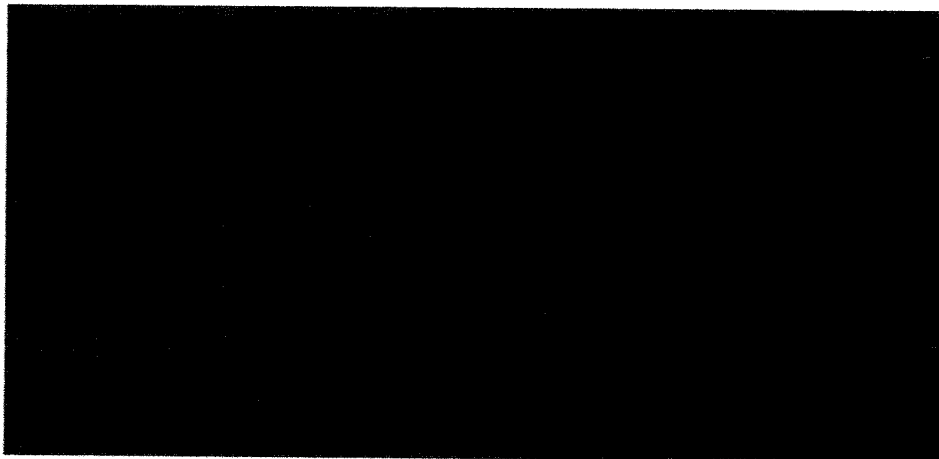
(U) The information available to us provides reasonable cause to believe that the subject organization is assisting in, sponsoring, or providing financial, material, or technological support for, or financial or other services to or in support of Al-Itihaad al-Islamiya (AIAI), an entity named in the Annex to Executive Order 13224 (September 23, 2001).

[REDACTED]

~~SECRET~~ [REDACTED]

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